

August 2, 1999

U.S. Department of Transportation Dockets  
Attention: Rules Docket No. FAA-1999-5401  
400 Seventh Street, SW  
Room Plaza 401  
Washington, DC 20590

Subject: Notice of Proposed Rulemaking, Aging Airplane Safety, 64 Federal Register, 16298, April 2, 1999

Ladies/Gentlemen:

FAA has issued a Notice of Proposed Rulemaking, which, if adopted, would require all airplanes operated under part 121 of Title 14, Code of Federal Regulations (14 CFR), all U.S. registered multiengine airplanes operated under 14 CFR part 129, and all multiengine airplanes used in scheduled operations under 14 CFR part 135 to undergo records reviews and inspections by the Administrator after their 14<sup>th</sup> years in service to ensure that the maintenance of these airplanes' age sensitive parts and components has been adequate and timely.

The Air Transport Association<sup>1</sup> (ATA), which represents the major U.S. air carriers, joins the National Air Transportation Association in requesting that the comment period for the referenced proposal be extended for an additional sixty (60) days.

Since the inception of the Aging Aircraft Program, ATA members have been proactive in incorporating specific continuing airworthiness maintenance methods to assure that the maintenance of older aircraft is timely and effective. Incorporation of mandated programs including SSID, CPCP, RAP, etc. as well as compliance with an air carriers maintenance program provides, we believe, the requirements necessary to comply with the proposed rule.

The proposal; however, provides no mention of proactive initiatives that industry has incorporated to date. As such, the air carriers request additional time to review the proposal and provide specific details, which support the airline response. Additionally, a complete economic review will be required to identify the actual costs to carriers. As the proposal will significantly alter the standard

course of business in today's environment, the economic impact may well be exceed the figures contained within the proposal.

Thank you for your consideration of these views.

Sincerely,

Art Coulomb  
Director, Maintenance &  
Materiel

Cc: Engineering, Maintenance, & Materiel Council  
Airworthiness Engineering Committee  
Reference: 99-AE-037

---

<sup>1</sup> ATA's members are Airborne Express, Alaska Airlines, Aloha Airlines, America West Airlines, American Airlines, American Trans Air, Atlas Air, Continental Airlines, Delta Air Lines, DHL Airways, Emery Worldwide, Evergreen International Airlines, Federal Express, Hawaiian Airlines, Midwest Express Airlines, Northwest Airlines, Polar Air Cargo, Reeve Aleutian Airways, Southwest Airlines, Trans World Airlines, United Airlines, United Parcel Service and US Airways. Our associate members are Aeromexico, Air Canada, Canadian Airlines International, KLM Royal Dutch Airlines and Mexicana.